

BLANKROME

300 Carnegie Center | Suite 220 | Princeton, NJ 08540

A Pennsylvania LLP | Stephen M. Orlofsky, New Jersey Administrative Partner

blankrome.com

Phone: (609) 750-7700

Fax: (609) 750-7701

March 18, 2025

VIA ELECTRONIC COURT FILING SYSTEM

Honorable Harvey Bartle III, U.S.D.J.

U. S. District Court for the Eastern District of Pennsylvania

16614 U.S. Courthouse

601 Market Street

Philadelphia, PA 19106

Re: *Atlas Data Privacy Corporation v. Belles Camp Comm. Inc., et al.*,

Civil Docket No.: 1:24-cv-04949 HB

Joinder in Defendants' Consolidated Motions to Dismiss Plaintiffs' Complaint

Dear Judge Bartle:

We represent the Defendant Belles Camp Communications, Inc. (“Defendant”) in the above-referenced matter. We write to advise this Court that Defendant joins: in: 1) the Consolidated Motion to Dismiss Pursuant to Rule 12(b)(6) that was filed in the action captioned as *Atlas Data Privacy Corporation, et al. v. DM Group, Inc.*, Case No. 1:24-cv-04075-HB (D.N.J) and 2) the Consolidated Motion to Dismiss Pursuant to FRCP 12(b)(2) that was filed in the action captioned as *Atlas Data Privacy Corporation, et al. v. GoHunt, LLC, et al.*, Case No. 1:24-cv-04380-HB (D.N.J) (collectively, the “Consolidated Motions to Dismiss”).

In addition, contemporaneous with the filing of this correspondence, Defendant is filing a Supplemental Brief in Support of its Motions to Dismiss Plaintiffs’ Complaint (the “Supplemental Brief”). For the reasons set forth in the Consolidated Motions to Dismiss and the Supplemental Brief, Defendant respectfully requests that this Court dismiss Plaintiffs’ Complaint with prejudice.

Respectfully submitted,

BLANK ROME LLP

/s/ Stephen M. Orlofsky

STEPHEN M. ORLOFSKY

PHILIP N. YANNELLA

THOMAS P. CIALINO

300 Carnegie Center, Suite 220

Princeton, NJ 08540

Stephen.Orlofsky@BlankRome.com

Philip.Yannella@BlankRome.com

Thomas.Cialino@BlankRome.com

cc: All Counsel of Record (*via ECF*)